IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,))
UNITED STATES OF AMERICA,	j
v.) CASE NO: 1:16-mj-00406
JUSTIN GRAY LIVERMAN,) The Honorable John F. Anderson
Defendant.)
)

DEFENSE MOTION TO MODIFY CONDITION OF PRETRIAL RELEASE

Defendant Justin G. Liverman, by and through counsel, hereby moves this Honorable Court for a modification of the travel restrictions set forth in the Amended Order Setting Conditions of Release (Document 16) to allow Defendant to travel to visit his elderly and ill grandfather who resides in Lanexa, Virginia. Mr. Liverman's present travel restrictions allow for him to travel only to the Eastern District, and only for court purposes. Defendant is seeking a limited, particularized modification for purposes of visiting Charles Epperson at 3068 N. Riverside Dr, Lanexa, VA 23089 on November 18 through November 20, 2016. Government Counsel has been notified of Defendant's request.

Respectfully Submitted, By Counsel:

Marina Medvin, VSB # 78820 Attorney for Defendant MEDVIN LAW PLC 916 Prince Street, Ste. 109 Alexandria, Virginia 22314

Tel: 703.870.6868 Fax: 703.870.3772

Email: marina@medvinlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2016, I filed the foregoing document electronically through the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record.

Pursuant to the Electronic Case Filing Policies and Procedures, a courtesy print copy of the foregoing will be delivered to Chambers within one business day of the electronic filing.

/s/

Marina Medvin, VSB # 78820 Attorney for Defendant MEDVIN LAW PLC 916 Prince Street, Ste. 109 Alexandria, Virginia 22314

Tel: 703.870.6868 Fax: 703.870.3772

Email: marina@medvinlaw.com